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May 6, 2016

Via E-filing and Email: chambersnysdseibel@nysd.uscourts.gov

The Honorable Cathy Seibel
United States District Court
for the Southern District of New York
The Hon. Charles L. Brieant Jr. Federal Building
and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: The Wave Studio, LLC v. General Hotel Management Ltd., et al.
Case No. 7:13-cv-09239-CS-PED

Dear Judge Seibel:

This firm is counsel for Defendant General Hotel Management Ltd. (“GHM”). GHM’s Motion for Summary Judgment (“GHM’s Motion”) is being filed via ECF concurrently with this letter.¹

We write in accordance with Your Honor’s Individual Practices to request oral argument of GHM’s Motion. The facts of this case and, as a result, the legal arguments in GHM’s Motion, are exceedingly complex and have been made even more complicated by additional legal and factual theories set forth for the first time in Plaintiff’s opposition and cross-motion papers. Because specific facts and legal arguments (including issues of Singapore law) may need further clarification and analysis that counsel can best provide at oral argument, we respectfully submit that oral argument will be beneficial for the Court as it renders a decision.

We also write to bring to the Court’s attention that two citations within the Memorandum of Law in support of GHM’s Motion served on Plaintiff’s counsel on February 12, 2016 (and being filed herewith) contain inadvertent typos. In both instances where § 3205 of the COMPENDIUM OF U.S. COPYRIGHT OFFICE PRACTICES is cited, the correct citation is to § 2305. We apologize for any inconvenience this may cause the Court or our adversary.

¹ In accordance with Your Honor’s preferences, GHM’s motion papers – along with Plaintiff’s opposition and cross-motion papers – have been bundled and are all being filed electronically today.

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Please feel free to contact the undersigned should you require any additional information.
We thank Your Honor for your attention to these matters.

Respectfully submitted,



Howard J. Schwartz

HJS:ajr
cc: All counsel of record via ECF